

**AFFIDAVIT IN SUPPORT
OF CRIMINAL COMPLAINT**

I, Daniel Flores, depose and make this affidavit in support of a complaint for violation of Title 18, United States Code, Section 1001(a)(2) by FELIPE DE JESUS ZAVALA MEDEL, A/K/A JOHNY JOE OLIVO. I am an Officer with U.S. Customs and Border Protection (“U.S. CBP”). I am stationed at the Coburn Gore Port of Entry in Coburn Gore, Maine. I have been an employee of U.S. CBP since 2012. I successfully graduated from Field operation Academy at the Federal Law Enforcement Training Center on May 13, 2013. I base this affidavit on my own investigation as well as discussions with other agents and/or reading of investigative reports and other materials.

1. I am aware that on January 28, 2025, at approximately 9:10 p.m., a male approached the Coburn Gore, Maine, Port-of-Entry (“POE”)¹ from the Country of Canada, and presented himself for inspection for admission into the United States.
2. This male, later identified as FELIPE DE JESUS ZAVALA MEDEL (hereinafter “ZAVALA MEDEL”), was the sole occupant traveling in a 2003 Cadillac Escalade bearing an Iowa license plate. ZAVALA MEDEL presented a North Dakota driver’s license in the name of Johny Joe Olivo (DOB xx/xx/1963), with a photograph of ZAVALA MEDEL on it, to U.S. CBP Officer Zietz at the POE.
3. Officer Zietz spoke with ZAVALA MEDEL, who said that he was born in Texas and lived in the United States. ZAVALA MEDEL also said that he was traveling

¹ As a general matter, a port-of-entry is a designated place where people and goods can legally enter the United States.

to Waterville to work at a paper mill. After speaking with ZAVALA MEDEL, Officer Zietz referred him for a secondary inspection.

4. I met with ZAVALA MEDEL at the secondary inspection area. ZAVALA MEDEL was asked to complete U.S. CBP Form 6059B, which is a Customs Declaration form. On the form, ZAVALA MEDEL indicated that his name was "JOHNY JOE OLIVO," and his date of birth was xx/xx/63. ZAVALA MEDEL signed the form and directly above his signature, it states: "I HAVE READ THE IMPORTANT INFORMATION ON THE REVERSE SIDE OF THIS FORM AND HAVE MADE A TRUTHFUL DECLARATION."
5. In secondary, I asked ZAVALA MEDEL questions relating to his admissibility and alienage to enter the United States, including what his father's name was. ZAVALA MEDEL was unable to answer that question and pulled out what appeared to be a small birth certificate in the name of JOHNY JOE OLIVO (DOB xx/xx/1963) from the State of Texas to read from it.
6. ZAVALA MEDEL was subsequently detained, and the vehicle ZAVALA MEDEL had been driving was searched.
7. During an inspection of the vehicle, a suitcase was found inside with the name "ZAVALA/Clau" written on a luggage tag on the suitcase. ZAVALA MEDEL said that his daughter's name was Claudia MENDEZ. Additionally, a piece of mail was found inside the vehicle with the names Esther MENDEZ and Felipe De Jesus ZAVALA MEDEL on it, with an address in Sioux City, Iowa.
8. During subsequent questioning, ZAVALA MEDEL admitted that his true identity was Felipe De Jesus ZAVALA MEDEL and not Johny Joe Olivo. ZAVALA MEDEL admitted that he was born in the country of Mexico in 1960 and that he

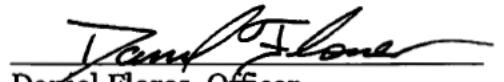
is a citizen of Mexico. ZAVALA MEDEL said that he got lost following his GPS on his way to Waterville, Maine, and crossed into Canada. After entering Canada, ZAVALA MEDEL said that he sought admission into the United States on January 28, 2025, at the Coburn Gore, Maine, POE.

9. Additionally, ZAVALA MEDEL admitted that he did not have any documents that allowed him to legally enter, reside, or work in the United States. At the time he tried to enter the United States at the POE, ZAVALA MEDEL admitted that he showed the officer the North Dakota driver's license in the name of Johny Joe OLIVO, claiming to be that person. ZAVALA MEDEL said that he bought the Texas birth certificate in the name of Johny Joe OLIVO in Salt Lake City, Utah.
10. ZAVALA MEDEL said he wished to enter the United States to live and work in the United States. He said he has lived in the United States since 1987 and only left once in 2023 when he got lost and crossed into Canada from Maine. ZAVALA MEDEL said that he has two houses in Iowa and a house in North Dakota and he provided an address of where he lives in Sioux City, Iowa. This address in Sioux City, Iowa, is the same address that appears on the piece of mail with ZAVALA MEDEL's name on it that was found inside the vehicle.
11. Based on checks relating to the Johny Joe OLIVO (DOB xx/xx/63), it appears that OLIVO is deceased and passed away in Texas.
12. In my training and experience, information pertaining to an individual's identity and where they were born is relevant and pertinent information in determining whether an individual is eligible for admissibility into the United States.

Based on my training and experience, and supported by the foregoing facts, I have probable cause to believe the above defendant, ZAVALA MEDEL, A/K/A OLIVO, has violated Title 18, United States Code, Section 1001(a)(2).

I, Daniel Flores, hereby swear under oath that the information set forth in this affidavit is true and correct to the best of my knowledge, information, and belief, and that I make this oath under pains and penalties of perjury.

Dated at Bangor, Maine, this 29 th day of January 2025.



Daniel Flores, Officer
U.S. Customs and Border Protection

Sworn to telephonically and signed electronically in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedure

Date: Jan 29 2025

City and state: Bangor, ME

